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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC.; a Colorado corporation;
 ORACLE AMERICA, INC.; a Delaware
 corporation; and ORACLE INTERNATIONAL
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
 and SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-VCF

**DECLARATION OF JACOB J.O.
 MINNE IN SUPPORT OF
 ORACLE'S MOTION FOR
 SANCTIONS PURSUANT TO
 FEDERAL RULE OF CIVIL
 PROCEDURE 11, 28 U.S.C. § 1927,
 AND THE COURT'S INHERENT
 AUTHORITY**

1 I, Jacob J.O. Minne, declare as follows:

2 1. I am an attorney admitted to practice law in the State of California and before the
3 Court in this action *pro hac vice*. I am an associate at Morgan, Lewis & Bockius LLP, counsel of
4 record for Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation
5 (collectively “Oracle”) in this action. I have personal knowledge of the facts stated below and
6 could and would testify to them if called upon to do so.

7 2. Attached as Exhibit 1 is a true and correct copy of excerpts from *Oracle USA, Inc.*
8 *v. Rimini Street, Inc.*, Case No. 18-16554 (9th Cir.) (“2018 Appeal”), ECF No. 46-1 and 46-3,
9 Rimini’s Letter re Additional Developments and Exhibit B thereto.

10 3. Attached as Exhibit 2 is a true and correct copy of excerpts from 2018 Appeal,
11 ECF No. 4-1, Rimini’s Motion to Stay the Order of Permanent Injunction.

12 4. Attached as Exhibit 3 is a true and correct copy of 2018 Appeal, ECF No. 11,
13 Ninth Circuit’s Order Denying Rimini’s Motion to Stay the Order of Permanent Injunction.

14 5. Attached as Exhibit 4 is a true and correct copy of excerpts from 2018 Appeal,
15 ECF No. 12, Opening Brief for Rimini Street, Inc.

16 6. Attached as Exhibit 5 is a true and correct copy of 2018 Appeal, ECF No. 45,
17 Oracle’s Letter re Rimini’s 28(j) Notice of Authorities.

18 7. Attached as Exhibit 6 is a true and correct copy of excerpts from 2018 Appeal,
19 ECF No. 23, Answering Brief for Oracle.

20 8. Attached as Exhibit 7 is a true and correct copy of 2018 Appeal, ECF No. 53-1 and
21 53-2, Rimini’s 28(j) Notice of Authorities and Exhibit A thereto.

22 9. On April 20, 2020, Counsel for Rimini was served with a copy of “ORACLE’S
23 MOTION FOR SANCTIONS PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 11,
24 28 U.S.C. § 1927, AND THE COURT’S INHERENT AUTHORITY.” Rimini did not withdraw
25 its Motion to Enforce after receiving Oracle’s Rule 11 Motion and expressly declined to do so in
26 correspondence dated May 7, 2020. The motion filed herewith is identical to the motion served
27

1 on Rimini except for two non-substantive changes on page seven, and the addition of exhibit
2 numbers for citations to the documents attached to this declaration.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is
4 true and correct and that this declaration is executed at Daly City, California, on May 12, 2020.

5
6 Dated: May 12, 2020

/s/ Jacob J.O. Minne

Jacob J.O. Minne